

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Southern Division**

BAE SYSTEMS TECHNOLOGY)
SOLUTIONS & SERVICES, INC.)
)
)
Plaintiff,)
)
)
v.)
)
)
REPUBLIC OF KOREA'S DEFENSE)
ACQUISITION PROGRAM)
ADMINISTRATION AND)
THE REPUBLIC OF KOREA)
)
)
Defendants.)

Case No. PWG-14-3551

MOTION FOR LEAVE TO FILE BRIEF IN EXCESS OF PAGE LIMITS

Defendants, the Republic of Korea and its Defense Acquisition Program Administration (collectively, “Defendants”), by and through their attorneys, move the Court for leave to file a brief exceeding the page limit set by the Court for the reply brief in support of their motion to dismiss. In support of this motion, Defendants offer the following points and authorities:

On November 2, 2015, Defendants filed a motion seeking an extension of three business days of the time for them to submit their reply in support of their motion to dismiss because of difficulties Defendants and their counsel had encountered as a result of Plaintiff’s lengthy submission in opposition to Defendants’ motion and the time difference between Seoul, Republic of Korea and the District of Maryland. Prior to filing the motion, Defendants contacted Plaintiff to inquire whether it would consent to Defendants’ motion. Plaintiff indicated that it would not agree to a further extension.

On November 3, 2015, Defendants filed a motion seeking expedited consideration of their motion to extend because Defendants had been unable to remedy the difficulties they had encountered in sufficient time to adequately prepare the reply brief. On November 4, 2015, Defendants, having not received a decision on their motion to extend, contacted Plaintiff again to inquire whether it would agree to a shorter extension of one or two business days. Again, Plaintiff declined to consent to a further extension. As a result, Defendants' counsel lacked sufficient time to refine and shorten Defendants' reply brief.

WHEREFORE, Defendants respectfully request that this Court grant them leave to file a reply brief that exceeds the page limits set by the Court with respect to their motion to dismiss.

Dated: November 5, 2015

Respectfully submitted,

/s/

Jason D. Wallach
(D. Md. Bar No. 18466)
Richard J. Conway (*admitted pro hac vice*)
DICKSTEIN SHAPIRO LLP
1825 Eye Street, N.W.
Washington, DC 20006
Telephone: (202) 420-2200
Fax: (202) 420-2201
wallachj@dicksteinshapiro.com
conwayr@dicksteinshapiro.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of November 2015, a copy of the foregoing motion was served by ECF notification upon

Ari Scott Meltzer
Gregory M. Williams
Richard W. Smith
WILEY REIN LLP
1776 K Street NW
Washington, DC 20006
ameltzer@wileyrein.com
gwilliams@wileyrein.com
rsmith@wileyrein.com

Attorneys for Plaintiff

/s/
Jason D. Wallach